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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF HEARING ON REORGANIZED
DEBTORS' ONE HUNDRED NINTH
OMNIBUS OBJECTION TO CLAIMS
(BOOKS AND RECORDS CLAIMS /
SATISFIED CLAIMS)**

**Response Deadline:
October 26, 2021, 4:00 p.m. (PT)**

Hearing Information If Timely Response Made:

Date: November 9, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E Corporation
2 and Pacific Gas and Electric Company, as debtors and reorganized debtors (the “**Debtors**,” or as
3 reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases
4 (the “**Chapter 11 Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the
United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the
Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

5 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on
6 **November 9, 2021, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) before the Honorable
Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Seventh*
7 *Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, effective
June 28, 2021 and until otherwise ordered, **all hearings shall be conducted by video or**
8 **teleconference. The Courtroom will be closed.** All interested parties should consult the Bankruptcy
Court’s website at www.canb.uscourts.gov for information about court operations during the COVID-
9 19 pandemic. The Bankruptcy Court’s website provides information regarding how to arrange a
telephonic or video appearance. If you have any questions regarding how to appear at a court hearing,
10 you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on
the Bankruptcy Court’s website.

11 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at the
12 Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Reorganized Debtors’ One Hundred*
Ninth Omnibus Objection to Claims (Books and Records Claims / Satisfied Claims), filed on
13 September 28, 2021 [Dkt. No. 11346] (the “**Omnibus Objection**”).

14 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Omnibus
Objection must be in writing, filed with the Bankruptcy Court, and served on counsel for the
15 Reorganized Debtors at the above-referenced address or by email at PGEclaims@kbklp.com so as to
be received by no later than **4:00 p.m. (Pacific Time) on October 26, 2021**. Any oppositions or
16 responses must be filed and served as described in the *Order Approving (A) Procedures for Filing*
Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections,
17 entered on July 1, 2020 [Dkt No. 8228] (the “**Omnibus Objections Procedures Order**”). **Any relief**
requested in the Omnibus Objection may be granted without a hearing if no opposition is timely
18 **filed and served in accordance with the Omnibus Objections Procedures Order.** In deciding the
Omnibus Objection, the Court may consider any other document filed in these Chapter 11 Cases and
19 related Adversary Proceedings.

20 **PLEASE TAKE FURTHER NOTICE** that a customized One Hundred Ninth Omnibus Claim
Objection Notice in substantially the form attached hereto as **Exhibit A** or **Exhibit B**, as applicable,
21 has been sent to each of the parties to whose Proof(s) of Claim the Reorganized Debtors objected in the
Omnibus Objection.
22

23 **PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection and its
supporting papers can be viewed and/or obtained: (i) by accessing the Court’s website at
24 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
Gate Avenue, San Francisco, CA 94102, or (iii) from the Reorganized Debtors’ notice and claims
25 agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll
free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
26 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
Bankruptcy Court’s website.
27
28

1 Dated: September 28, 2021

KELLER BENVENUTTI KIM LLP

2 /s/ Thomas B. Rupp

3 Thomas B. Rupp

4 *Attorneys for Debtors and Reorganized Debtors*

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Exhibit A

**One Hundred Ninth Omnibus Claim Objection Notice
(Claims To Be Reduced or Disallowed)**

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3 (dtaylor@kbkllp.com)
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4 (trupp@kbkllp.com)
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5 San Francisco, CA 94108
Tel: 415 496 6723
6 Fax: 650 636 9251

7 *Attorneys for Debtors and Reorganized Debtors*

THE OBJECTION DESCRIBED IN THIS NOTICE ASKS THE COURT TO REDUCE OR DISALLOW YOUR CLAIM(S) IDENTIFIED AS "OBJECTED-TO" ON THE FOLLOWING PAGE OF THIS NOTICE.

CLAIMANTS RECEIVING THIS NOTICE SHOULD READ THIS NOTICE CAREFULLY BECAUSE THE OBJECTION MAY AFFECT YOUR RIGHT TO RECEIVE A DISTRIBUTION ON YOUR CLAIM IN THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE CONTACT PRIME CLERK, LLC, AT (844) 339-4217

THE LAST PARAGRAPH OF THIS NOTICE EXPLAINS HOW YOU CAN OBTAIN A COMPLETE COPY OF THE OBJECTION, AT NO COST TO YOU.

12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 **In re:**

16 **PG&E CORPORATION,**

17 **- and -**

18 **PACIFIC GAS AND ELECTRIC**
19 **COMPANY,**

20 **Debtors.**

- 21 ☐ Affects PG&E Corporation
22 ☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

23 ** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

NOTICE OF HEARING ON REORGANIZED DEBTORS' ONE HUNDRED NINTH OMNIBUS OBJECTION TO CLAIMS (BOOKS AND RECORDS CLAIMS / SATISFIED CLAIMS)

Response Deadline:
October 26, 2021, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: November 9, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

[Claimant Name]

Objected-To Claim(s)					Reduced Claim Amount
Date	Claim #	Debtor	Classification	Amount	

On September 28, 2021, PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed their *One Hundred Ninth Omnibus Objection to Claims (Books and Records Claims / Satisfied Claims)* (the “**Omnibus Objection**”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”). A full copy of the Omnibus Objection may be obtained at no cost, as provided below.

Any Response (as defined below) to the Omnibus Objection must be filed and served upon the Reorganized Debtors’ Counsel by October 26, 2021 (the “Response Deadline”);

Any Response must be accompanied by any declarations or memoranda of law any responding party wishes to present in support of its position;

If there is no timely Response, the Bankruptcy Court may enter an order granting the Omnibus Objection to your Proof(s) of Claim by default.

If you file a timely Response, the Hearing will be held at the date and time shown below. If factual disputes are presented by the Objection and the Response, the Hearing will proceed as a status conference; factual disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at the Hearing. Issues of a purely legal nature, where facts are not in dispute, may be decided at the Hearing. See Bankruptcy Local Rule 3007-1.

If you file and serve a timely Response, the date, location and time of the Hearing are:

November 9, 2021, at 10:00 a.m. (Pacific Time)

Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA

The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Seventh Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, effective June 28, 2021 and until otherwise ordered, **all hearings shall be conducted by video or teleconference. The Courtroom will be closed.** All interested parties should consult the Bankruptcy Court’s website at www.canb.uscourts.gov for information about court operations during the COVID-19 pandemic. The Bankruptcy Court’s website provides information regarding how to arrange a telephonic or video appearance. If you have any questions regarding how to appear at a court hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court’s website.

These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.

1 **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus
2 Objection, the Reorganized Debtors seek to reduce or disallow the amount of one or more of your
3 Proof(s) of Claim (as defined therein) listed above as “Objected-To Claim(s)” on the ground that the
4 designated Proof(s) of Claim seeks amounts for which the Debtors are not liable. If you do **NOT**
5 oppose the reduction or disallowance of your Objected-To Proof(s) of Claim listed above, then you do
6 NOT need to file a written Response to this Omnibus Objection and you do NOT need to appear at the
7 Hearing. If you do nothing, the Objected-To Claim(s) will be allowed in the amount listed in the
8 “Reduced Claim Amount” column above or disallowed in its entirety if the Reduced Claim Amount is
9 zero.

10 **FILING AND SERVICE OF RESPONSE:** If you **DO** oppose the reduction or disallowance
11 of your Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a “**Response**”), in
12 writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at
13 PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on**
14 **October 26, 2021 (the “Response Deadline”)**: You must file the Response through the Court’s
15 electronic case filing (“ECF”) system if you have access to the ECF system; service on the
16 Reorganized Debtors’ Counsel will occur automatically upon ECF filing; and no separate service of
17 your Response is required. If you do NOT have access to the ECF system, service must be made by
18 electronic mail to the Reorganized Debtors’ counsel at PGEclaims@kbkllp.com, and you must arrange
19 for the Response to be filed with the Court within two business days thereafter. If you do not have the
20 ability to serve a Response electronically, the Response must be served by mail, express or some other
21 means so either (a) it is actually received by the Reorganized Debtors’ Counsel by the Response
22 Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or commercial
23 express service that will make actual delivery not more than two business days after the Response
24 Deadline, and in that case the Claimant must inform the Reorganized Debtors’ counsel by email,
25 telephone or facsimile before the Response Deadline of the Claimant’s name and phone number, the
26 number of the Omnibus Objection, and the fact that a paper Response is being delivered by express.

27 **CONTENTS OF RESPONSE** The Response must, at a minimum, include the following:
28 (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the
case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the
assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of
Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain
the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal
knowledge of the relevant facts that support the Response; (v) your name, address, telephone number,
and/or the name, address, and telephone number of your attorney and/or designated representative to
whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vi) the
name, address, telephone number, and email address of the party with authority to reconcile, settle, or
otherwise resolve the Omnibus Objection on your behalf, if any.

 If the Bankruptcy Court does not reduce or disallow your Objected-To Proof(s) of Claim listed
above, then the Reorganized Debtors have the right to object on other grounds to your Proof(s) of
Claim at a later date. You will receive a separate notice of any such objection.

TO GET COPIES OF THE COMPLETE OBJECTION: Copies of the complete Omnibus
Objection and the other pleadings and documents identified herein can be viewed and/or obtained:
(i) by accessing the Bankruptcy Court’s website at <http://www.canb.uscourts.gov> [PACER account
required], (ii) for free by download from on the Reorganized Debtors’ approved notice and claim
agent’s website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free,

1 by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com to
2 request a complete copy of the Omnibus Objection, including all Exhibits.

3
4 Dated: September 28, 2021

KELLER BENVENUTTI KIM LLP

/s/ Thomas B. Rupp

Thomas B. Rupp

Attorneys for Debtors and Reorganized Debtors

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Exhibit B
One Hundred Ninth Omnibus Claim Objection Notice
(Claims To Be Disallowed and Expunged)

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5 San Francisco, CA 94108
Tel: 415 496 6723
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7 *Attorneys for Debtors and Reorganized Debtors*
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THE OBJECTION DESCRIBED IN THIS NOTICE ASKS THE COURT TO DISALLOW AND EXPUNGE YOUR CLAIM(S) IDENTIFIED AS "OBJECTED-TO" ON THE FOLLOWING PAGE OF THIS NOTICE.

CLAIMANTS RECEIVING THIS NOTICE SHOULD READ THIS NOTICE CAREFULLY BECAUSE THE OBJECTION MAY AFFECT YOUR RIGHT TO RECEIVE A DISTRIBUTION ON YOUR CLAIM IN THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE CONTACT PRIME CLERK, LLC, AT (844) 339-4217

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15 **SAN FRANCISCO DIVISION**

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18 **- and -**

19 **PACIFIC GAS AND ELECTRIC**
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- 22 ☐ Affects PG&E Corporation
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Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

NOTICE OF HEARING ON REORGANIZED DEBTORS' ONE HUNDRED NINTH OMNIBUS OBJECTION TO CLAIMS (BOOKS AND RECORDS CLAIMS / SATISFIED CLAIMS)

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Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

[Claimant Name]

Objected-To Claim(s)					Basis for Objection
Date	Claim #	Debtor	Classification	Amount	

On September 28, 2021, PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed their *One Hundred Ninth Omnibus Objection to Claims (Books and Records Claims / Satisfied Claims)* (the “**Omnibus Objection**”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”). A full copy of the Omnibus Objection may be obtained at no cost, as provided below.

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3 **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus
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7 your Objected-To Proof(s) of Claim listed above, then you do NOT need to file a written Response to
8 this Omnibus Objection and you do NOT need to appear at the Hearing. If you do nothing, the
9 Objected-To Claim(s) will be disallowed.

10 **FILING AND SERVICE OF RESPONSE:** If you **DO** oppose the disallowance of your
11 Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a “**Response**”), in
12 writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at
13 PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on**
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15 electronic case filing (“ECF”) system if you have access to the ECF system; service on the
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20 ability to serve a Response electronically, the Response must be served by mail, express or some other
21 means so either (a) it is actually received by the Reorganized Debtors’ Counsel by the Response
22 Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or commercial
23 express service that will make actual delivery not more than two business days after the Response
24 Deadline, and in that case the Claimant must inform the Reorganized Debtors’ counsel by email,
25 telephone or facsimile before the Response Deadline of the Claimant’s name and phone number, the
26 number of the Omnibus Objection, and the fact that a paper Response is being delivered by express.

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29 case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the
30 assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of
31 Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain
32 the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal
33 knowledge of the relevant facts that support the Response; (v) your name, address, telephone number,
34 and/or the name, address, and telephone number of your attorney and/or designated representative to
35 whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vi) the
36 name, address, telephone number, and email address of the party with authority to reconcile, settle, or
37 otherwise resolve the Omnibus Objection on your behalf, if any.

38 If the Bankruptcy Court does not disallow your Objected-To Proof(s) of Claim listed above,
39 then the Reorganized Debtors have the right to object on other grounds to your Proof(s) of Claim at a
40 later date. You will receive a separate notice of any such objection.

41 **TO GET COPIES OF THE COMPLETE OBJECTION:** Copies of the complete Omnibus
42 Objection and the other pleadings and documents identified herein can be viewed and/or obtained:
43 (i) by accessing the Bankruptcy Court’s website at <http://www.canb.uscourts.gov> [PACER account
44 required], (ii) for free by download from on the Reorganized Debtors’ approved notice and claim
45 agent’s website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free,

1 by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com to
2 request a complete copy of the Omnibus Objection, including all Exhibits.

3
4 Dated: September 28, 2021

KELLER BENVENUTTI KIM LLP

/s/ Thomas B. Rupp

Thomas B. Rupp

Attorneys for Debtors and Reorganized Debtors